

HPNS Technical Team Meeting Agenda
September 18, 2018, 1000-1100 PT

1. Welcome and check-in

Navy BRAC – Steve Banister, Pat Brooks, Danielle Janda, Derek Robinson, Thomas Macchiarella

Navy BRAC Consultants – Craig Bias, John Hackett, Scott Hay, Kim Henderson, Kathy Higley, ~~Alex Lopez~~

RASO – Zach Edwards, Matt Liscio, Matt Slack

EPA and consultants – Karla Brasaemle, ~~John Chesnutt~~, Jana Dawson, ~~Donna Getty~~, David Kappelman, ~~Jackie Lane~~, Lily Lee, ~~Lyndsey Nguyen~~

DTSC – Nina Bacey, ~~Janet Naito~~

CDPH – Sheetal Singh, Matt Wright

City (includes OCII/SFDPH and consultants) – Amy Brownell, Bob Burns, Christina Rain, ~~Dorinda Shipman~~

Water Board – ~~Tina Low~~, ~~David Tanouye~~, [Jeff White](#)

2. Parcel G and background soil work planning

- Work plan comments from regulators and public received 8/14-8/16
 - i. RTCs and Draft Final due to regulators by 9/28
 - 1. Discuss key RTCs – [The Navy has been working through the comments and there are a few EPA comments to discuss as follows:](#)
 - a. [General Comments 7 and 15 indicate that MDCs should be 10% of the RGs for all ROCs - for analytical methods, MDCs will be below the RGs with a target of 10% to 50% of the RGs in accordance with MARSSIM. The MDCs are different for every sample \(e.g., calculated per sample based on mass, activity, etc.\) and any issues will be addressed on a case-by-case basis. For building surfaces, gross alpha and beta scan MDCs will be set at the RGs with a target of 50% of the RGs for static measurements. The team agreed and noted a discrepancy in the SAP between the MDCs in Worksheet 15 and the lab SOPs that should be looked into. The MDCs in the worksheet are acceptable; however, if the SOPs show that the lab cannot meet the MDCs, increasing the sample size and count times were recommended. The SOPs are generally intended to be applicable for every situation, so the lab will be contacted for confirmation that the MDCs in Worksheet 15 can be met.](#)
 - b. [Specific Comment 6 indicates that cleanup goals should include an analysis of the sum of fractions and the unity rule to ensure total risk to the RME individual posed by multiple ROCs in soil or buildings does not exceed the CERCLA risk range - the sum of fractions and unity rule are part of a traditional MARSSIM approach to use assumed ratios of site ROCs to determine contributions to an overall dose or risk-based criterion. Therefore, the use of sum of fractions and unity rule to review](#)

total risk is not appropriate for this approach. Based on the regulators comments, the approach for Parcel G is to compare individual sample results above the expected range of NORM or anthropogenic background to the RGs on a point-by-point basis and the RGs are not based on the same dose or risk. Therefore, the use of sum of fractions and unity rule to review total risk is not appropriate for this approach. The team agreed based on the point-by-point comparison and recommended to also calculate a dose or risk for each SU. Kathy indicated caution if this is done based on the assumptions that convert field measurement to doses to estimate risk. Lily stated that in accordance with the NCP, EPA is proposing to start at 10⁻⁶ for decision-making but is confirming with management.

- c. Specific Comment 4 indicates that the Parcel G Data Evaluation Forms identified several instances of pipes being found in areas where they were thought to have previously been removed - clarification was requested on where this was found on the forms. Jana will look into this and provide a response tomorrow.
 - d. Additional regulatory comments/questions were discussed as follows:
 - i. How rad objects/Sr-90 sources will be located - gross gamma surveys will be used to detect bremsstrahlung radiation and the work plan will be updated to reflect this. It was requested that the work plan include what may be detected and to what depth.
 - ii. Isotopic U and Th analysis - the Navy is still looking into.
 - iii. Various locations in the text where allegations of potential data manipulation and falsification are referenced should now be stated as fact - the language will be updated in consultation with Navy legal since all of the allegations have not been confirmed.
 - iv. Why the most conservative value for the number of RBA samples from NUREG 1505 Table 13.5 was not selected - 25 surface and 25 subsurface soil samples will be collected from each RBA location (5 locations) and data sets may be able to be combined. The RBA areas were increased in size and should be comparable to SU sizes. Additional samples will be collected if needed.
 - v. Use of impacted Building 401 as a background location - the building RBA has been changed to Building 404, an unoccupied and unimpacted former supply storehouse.
2. Lily announced that based on the deck marker found in Parcel A, the EPA regional administrator and Nancy Pelosi's office are requesting bold and proactive measures including additional investigation at Parcels A and G, including 100% surface scanning and potential testing inside of homes if requested. The Team discussed the Parcel A deck marker.
 3. **Plan for managers meeting 9/26** - Lawrence is coordinating a meeting to discuss the work plan

- Draft SAP submitted to regulators and public 8/16
 - i. Comments expected by 9/24
 - ii. Preliminary questions? – Lily provided a list of 3 comments that were not covered by the Parcel G work plan comments:
 1. There are no criteria for decision-making to separate background by fill type.
 2. If background is separated by fill type, this would only be applicable to over excavation soil since the rest has been homogenized.
 3. Because Pu-239 was an ROC at the Former Buildings 317/364/365 Site, the trenches in the vicinity should also be sampled for Pu-239 analyses.

3. Findings reports

- Pending Navy review of RTCs and draft final
 - i. Parcels B and G Soil
 - ii. Parcels D-2, UC-1, UC-2, and UC-3 Soil
- Pending EPA comments
 - i. Buildings
 - ii. Parcel C Soil
 - iii. Parcel E Soil

4. Future calls/meetings

- Work plan managers meeting - 9/26/18
- Status call - 10/2/18, 1000-1100 PT
- Open house - 10/3/18
- Status call - 10/16/18, 1000-1100 PT